

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE: DEALER MANAGEMENT SYSTEMS
ANTITRUST LITIGATION

This Document Relates to All Cases

MDL No. 2817
Case No. 18 C 864

Hon. Robert M. Dow, Jr.
Magistrate Judge Jeffrey T. Gilbert

**STIPULATION AND [PROPOSED] ORDER REGARDING
NON-PARTIES' EXTENSION OF TIME TO PRODUCE DOCUMENTS**

On December 6, 2018, the Court ordered non-parties Ghaben Auto Group, LLC ("Ghaben Auto Group") and Generating Dealer Traffic, LLC d/b/a Open Recalls ("Open Recalls") to produce documents responsive to the Rule 45 subpoena that Defendant CDK Global, LLC ("CDK") served on Open Recalls and the Rule 45 subpoena that The Reynolds & Reynolds Company ("Reynolds") served on Ghaben Auto Group by December 21, 2018. *See* Dkt. 462. The Court further instructed the parties to submit a stipulation stating any agreed upon extension of the December 21, 2018 deadline. *Id.*

Pursuant to the Court's order, the parties hereby stipulate and agree that:

1. Ghaben Auto Group and Open Recalls have informed Defendants that they have made substantial progress in responding to the subpoenas, and have produced 66 pages of documents and 493 pages of documents, respectively, in response to Defendants' document requests.
2. Ghaben Auto Group and Open Recalls will produce any additional responsive documents on or before January 11, 2019.

SO ORDERED:

Magistrate Judge Jeffrey T. Gilbert

STIPULATED AND AGREED:

Dated: December 21, 2018

/s/ Derek T. Ho

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CERTIFICATE OF SERVICE

I, Derek T. Ho, an attorney, hereby certify that on December 21, 2018, I caused a true and correct copy of the foregoing **STIPULATION AND [PROPOSED] ORDER REGARDING NON-PARTIES' EXTENSION OF TIME TO PRODUCE DOCUMENTS** to be filed and served electronically via the court's CM/ECF system. Notice of this filing will be sent by e-mail to all parties by operation of the court's electronic filing system or by email to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the court's CM/ECF system.

/s/ Derek T. Ho

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